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Approved: 826 Fmt  
ALINE R. FLODR/ SHEB SWETT/ SAGAR K. RAVI  
Assistant United States Attorneys

Before: THE HONORABLE ONA T. WANG  
United States Magistrate Judge  
Southern District of New York

- - - - - x  
UNITED STATES OF AMERICA : SEALED COMPLAINT  
: :  
- v. - : Violation of 18 U.S.C.  
: \$ 2113(a)  
: :  
JAMIE FRIERSON, :  
: COUNTY OF OFFENSE:  
: BRONX  
Defendant. :  
- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

Elisabeth Wheeler, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"):

COUNT ONE  
(Bank Robbery)

1. On or about May 8, 2019, in the Southern District of New York, JAMIE FRIERSON, the defendant, knowingly, by force and violence, and by intimidation, did take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), to wit, FRIERSON obtained money from a bank in the Bronx, by claiming that he was armed and demanding that a bank employee turn over to FRIERSON money in the bank's custody.

(Title 18, United States Code, Section 2113(a).)

The bases for my knowledge and for the foregoing charges, are, in part, as follows:

2. I am a Special Agent with the FBI. I am personally involved in the investigation of this matter. This affidavit is

based upon my conversations with other law enforcement officers, my examination of reports and records prepared by law enforcement officers, and my involvement in this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

#### The Bank Robbery

3. Based on my personal observations, conversations with other law enforcement officers, my review of surveillance footage and law enforcement reports, and my interview with a victim of the robbery ("Teller-1"), I have learned, in substance and in part, the following:

a. On or about May 8, 2019, at or about 2:54 p.m., a man who has since been identified as JAMIE FRIERSON, the defendant, see infra ¶¶ 4-6, entered a bank ("Bank-1") at 120 East Fordham Road between Creston Avenue and East 190th Street in the Bronx, New York. Upon approaching a teller window at Bank-1, FRIERSON passed a note to Teller-1, an employee of Bank-1, which read "I AM ARMED GIVE ME ALL OF IT! 100'S, 50'S, 20, 10 IMMEDIATELY NO DIE PACKS."

b. After providing Teller-1 with the note, JAMIE FRIERSON, the defendant, told Teller-1 in substance and in part: "Give me all hundreds. Give me all your money. I'm armed."

c. Teller-1 gave FRIERSON approximately \$200 of Bank-1's money and FRIERSON fled.

#### IDENTIFICATION OF JAMIE FRIERSON

4. Based on my participation in a prior investigation of JAMIE FRIERSON, the defendant, for bank robberies in Manhattan and my review of court and law enforcement records, I have learned, in substance and in part, the following:

a. On or about August 30, 2017, FRIERSON was arrested and charged in the Southern District of New York for committing a bank robbery in Manhattan on or about August 29, 2017, in violation of 18 U.S.C. § 2113(a).

b. On or about August 18, 2018, after FRIERSON was indicted on additional bank robbery charges, FRIERSON was convicted after a jury trial of committing five robberies of five separate banks in Manhattan between on or about August 16, 2017 and on or about August 29, 2017. Evidence at trial established that the defendant committed these robberies by passing notes to tellers threatening that FRIERSON had a gun. For example, one of the notes stated the following: "HELLO I AM ARMED GIVE ALL MONEY 100'S, 50'S, 20'S."

c. I personally participated in the investigation and prosecution of FRIERSON, including testifying at his trial about a search that I executed pursuant to a judicially-authorized warrant on a hotel room that FRIERSON was residing in when he was arrested in connection with the charges referenced herein, see supra ¶ 4a. I most recently saw FRIERSON on April 29, 2019, at his sentencing.

5. Based upon my review of still images from security video footage of the above-referenced robbery of Bank-1 on or about May 8, 2019, and, based on my familiarity with the physical appearance of JAMIE FRIERSON, the defendant, as well as his modus operandi, I believe FRIERSON is the same individual depicted in the security video footage from Bank-1 who robbed Bank-1 on or about May 8, 2019.

6. Based on my conversation with law enforcement agents who interviewed a relative ("Relative-1") of JAMIE FRIERSON, the defendant, on or about May 8, 2019, I have learned, in substance and in part, the following:

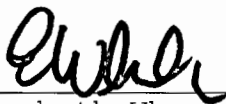
a. FRIERSON had been living with Relative-1 since on or about April 29, 2019.

b. After being shown still images from security video footage of the man who committed the above-referenced robbery of Bank-1 on or about May 8, 2019, Relative-1 identified the individual depicted in the still images as FRIERSON.

Federal Deposit Insurance Corporation

7. From my review of publicly available materials, as well as my training and experience as a Special Agent of the FBI, I know that, at all relevant times, the deposits of Bank-1, were insured by the FDIC.

WHEREFORE, the deponent respectfully requests that a warrant issue for the arrest of JAIME FRIERSON, the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.



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Elisabeth Wheeler  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
9th day of May, 2019



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THE HONORABLE THOMAS P. WANG  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK

